



Testimony
Before the Committee on Science,
Space, and Technology, House of
Representatives

For Release on Delivery
Expected at 10 a.m. ET
Tuesday, February 8, 2022

HUMAN AND DRUG TRAFFICKING

Actions Needed to Address Gaps in Federal Data to Counter Illicit Activities

Statement of Gretta L. Goodwin, Director,
Homeland Security and Justice

GAO Highlights

Highlights of [GAO-22-105707](#), a testimony Before the Committee on Science, Space, and Technology, House of Representatives

Why GAO Did This Study

Congress and federal agencies need data of sufficient quality to help ensure vulnerable populations are appropriately identified and supported. For example, virtual currencies are increasingly used in various legitimate transactions, but can also facilitate illicit activities, including human and drug trafficking. Further, AI/AN women in the U.S. experience higher rates of violence than most other women, and tribal and federal officials have stated that this incidence of violence constitutes a crisis. Federal officials and tribal stakeholders have raised concerns about challenges with cross-jurisdictional cooperation and a lack of comprehensive national data on cases.

This statement discusses GAO's prior work on (1) the extent to which the number of missing or murdered AI/AN women in the U.S. is known; and (2) what is known about the use of virtual currency for human and drug trafficking and the extent to which U.S. agencies collect data on these topics.

GAO reviewed available data and agency documentation on missing and murdered AI/AN women and the illicit use of virtual currency in human and drug trafficking, including relevant agency policies and procedures.

What GAO Recommends

GAO made 15 recommendations in prior reports, including developing a plan to continue analyses of data on missing and murdered AI/AN women and countering the illicit use of virtual currency in human and drug trafficking. Agencies concurred with 14 of 15 recommendations and GAO is monitoring planned actions to address them.

View [GAO-22-105707](#). For more information, contact Gretta L. Goodwin at (202) 512-8777 or goodwin@gao.gov.

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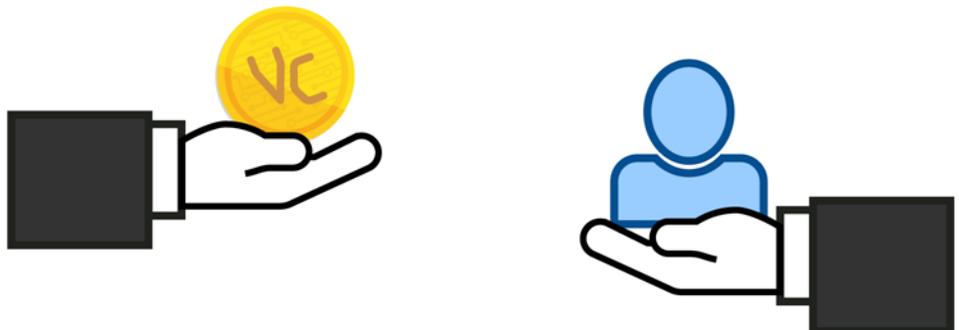
Actions Needed to Address Gaps in Federal Data to Counter Illicit Activities

What GAO Found

GAO has reported on issues affecting a variety of vulnerable populations, the need for additional data, and opportunities to help ensure that relevant data is accessible and of sufficient quality. Specifically:

- In October 2021, GAO reported that data on the total number of missing or murdered Indigenous women—referred to as American Indian and Alaska Native (AI/AN) women in this report—is unknown because federal databases do not contain comprehensive national data. Due to differences in the characteristics of these databases, including their intended purposes, specific contents, organization, and any applicable statutory restrictions, they cannot be combined together for this purpose. GAO reported that the Department of Justice has taken some steps to analyze data in federal databases related to cases of missing or murdered AI/AN women, including publishing more detailed single-year statistics in 2020 on missing persons by race, gender, and age. However, at the time of GAO's report, data analysis efforts were in the early stages, and the department did not have a plan to continue these efforts past November 2021. Developing such a plan could provide DOJ and other stakeholders with information to better understand the nature of the missing or murdered AI/AN crisis and identify emerging trends.
- Virtual currency is increasingly used illicitly to facilitate human and drug trafficking (see fig.). For example, in December 2021, GAO reported that the number of suspicious activity reports filed with the Financial Crimes Enforcement Network that involve virtual currency and drug trafficking increased fivefold (from 252 to 1,432) from calendar year 2017 to 2020. In December 2021, GAO also reported that data from selected federal agencies on virtual currency use for human and drug trafficking may not be consistently captured. Consequently, agencies may lack complete data when assessing or reporting on the illicit use of virtual currency in human and drug trafficking. GAO has made numerous recommendations in prior reports designed to address data challenges discussed in this statement. Agencies have taken some steps to address these recommendations and GAO is monitoring those ongoing efforts.

Virtual Currency is Being Used to Facilitate Human Trafficking



Source: GAO. | [GAO-22-105707](#)

Chairwoman Johnson, Ranking Member Lucas, and Members of the Committee:

I am pleased to be here today to discuss data challenges related to human trafficking and technology as it relates to our prior work on missing or murdered indigenous women and the use of virtual currency for human and drug trafficking. Congress and federal agencies need quality data to help ensure vulnerable populations are appropriately identified and supported. Having an effective framework or structure for capturing and reporting data can help ensure that an agency's data, in turn, provide useful information to the public. According to the National Academies of Sciences, Engineering, and Medicine, such data and statistics from the federal government and researchers provide the foundation for policymakers and others to make informed decisions.¹

We have reported on issues affecting a variety of vulnerable populations, the need for additional data, and opportunities to help ensure that relevant data are accessible and of sufficient quality. Vulnerability comes in many forms, including prior experiences of abuse and lack of resources or support systems. We have also reported on issues affecting a variety of vulnerable populations, including Native Americans (i.e., American Indians or Alaska Natives), victims of human trafficking, and victims of sexual violence. We have also previously reported that human trafficking—the exploitation of a person typically through force, fraud, or coercion for such purposes as forced labor, involuntary servitude or

¹National Academies of Sciences, Engineering, and Medicine, "Toward a Vision for a New Data Infrastructure for Federal Statistics and Social and Economic Research in the 21st Century" accessed Jan 28, 2022, <https://www.nationalacademies.org/our-work/toward-a-vision-for-a-new-data-infrastructure-for-federal-statistics-and-social-and-economic-research-in-the-21st-century>.

commercial sex—is occurring in the U.S.² Traffickers seek out persons perceived to be vulnerable, such as minors, and those experiencing poverty, homelessness, or chemical dependency.

Tribal leaders, federal officials, and other stakeholders have stated that the incidence of violence committed against American Indian and Alaska Native (AI/AN) women in the U.S. constitutes a crisis.³ For the purposes of this statement, we will refer to it as the missing or murdered Indigenous women crisis.⁴ According to federal researchers, AI/AN women suffer disproportionately from intimate partner violence and other violence, such

²Federal law generally recognizes two forms of human trafficking—sex trafficking and labor trafficking. The Trafficking Victims Protection Act of 2000, as amended, defines sex and labor trafficking under the term “severe forms of trafficking in persons,” the substance of which is largely mirrored by the act’s related criminal provisions. These severe forms of trafficking are (1) sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or (2) the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion, for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery. See Pub. L. No. 106-386, div. A, §§ 103, 112(a)(2), 114 Stat. 1464, 1469-71, 1486-89 (classified, as amended, at 22 U.S.C. § 7102(3) (coercion), (4) (commercial sex act), (8) (involuntary servitude), (11) (severe forms of trafficking in persons), (12) (sex trafficking); and criminal provisions codified, as amended, at 18 U.S.C. §§ 1584 (involuntary servitude), 1589 (forced labor), 1591 (sex trafficking)). For the primary human trafficking criminal statutes, see 18 U.S.C. chs. 77 (§§ 1581-1597), 117 (§§ 2421-2429). Human trafficking is separate from human smuggling, which need not involve exploitation and is the act of bringing into, or harboring/transporting within the United States, certain foreign individuals who are not permitted to lawfully enter or remain in the United States. See 8 U.S.C. §§ 1323-24.

³In this statement, we refer to a “woman” as a female adult who is 21 years or older because one of the federal laws relevant to this statement defines a child as someone under the age of 21. See 34 U.S.C. § 41307(a). For the purposes of this statement, “tribal stakeholders” include officials and members of Indian tribes, tribal law enforcement agencies, tribal advocacy organizations, or representatives from victim service providers who serve tribal communities.

⁴We use the phrase “missing or murdered” in this statement to signify two distinct types of cases investigated by law enforcement agencies—(1) cases where a woman has been reported as missing and (2) cases where a woman has been murdered. Further, we use the term “missing or murdered indigenous women” in referencing the ongoing crisis or specific initiatives. We refer to Indigenous people as “AI/AN” to be more specific and inclusive, as suggested by tribal advocacy organizations. We use the term “Indian” when describing federal laws, such as Savanna’s Act and the Not Invisible Act of 2019, which use that term.

as human trafficking and murder, compared with most other women.⁵ According to advocacy groups and the World Health Organization, the Coronavirus Disease 2019 (COVID-19) may be exacerbating the frequency of dating and intimate partner violence, which many tribal stakeholders consider to be a precipitating factor in AI/AN women going missing or being murdered.⁶ At congressional hearings on the federal response to the crisis of missing or murdered AI/AN women, various federal officials and tribal stakeholders have raised concerns about the lack of cross-jurisdictional cooperation and comprehensive national data on such incidents.⁷

Regarding human trafficking, there is no reliable estimate of the number of trafficking victims in the U.S. or of the money generated by this crime. According to the Department of State, the quality and quantity of data available are often hampered by the hidden nature of the crime, challenges in identifying individual victims, gaps in data accuracy and completeness, and significant barriers regarding the sharing of victim information.

Virtual currencies are increasingly being used as a payment method in various legitimate transactions, such as retail purchases, but can also

⁵For example, a report analyzing the findings from the National Intimate Partner and Sexual Violence Survey found that, when looking at specific types of violence, such as intimate partner violence, stalking, and psychological aggression, AI/AN women experienced higher rates compared with non-Hispanic white women. Specifically AI/AN women experienced physical violence from an intimate partner 1.6 times as often as non-Hispanic white women (55.5 percent vs. 34.5 percent); stalking 1.8 times as often (48.8 percent vs. 26.8 percent); and psychological aggression, 1.3 times as often (66.4 percent vs. 52 percent). See André B. Rosay, Violence Against American Indian and Alaska Native Women and Men, a report prepared for the National Institute of Justice, Department of Justice (June 2016).

⁶World Health Organization, COVID-19 and Violence Against Women: What the Health Sector/System Can Do, (April 7, 2020); Susan Montoya Bryan, "Advocates detail 'shadow pandemic' of violence against women," (Associated Press News), accessed August 2021, <https://apnews.com/article/pandemics-health-violence-coronavirus-cfb40ca690c9f556b742bd39e1e8e9b6>. Rosay, Violence Against American Indian and Alaska Native Women and Men).

⁷See, for example, hearings held by the U.S. Senate, Committee on Indian Affairs, "Missing and Murdered: Confronting the Silent Crisis in Indian Country," on December 12, 2018; and the U.S. House of Representatives, Committee on Natural Resources, Subcommittee for Indigenous Peoples of the United States, "Unmasking the Hidden Crisis of Murdered and Missing Indigenous Women: Exploring Solutions to End the Cycle of Violence," on March 14, 2019.

facilitate illicit activities, including human and drug trafficking.⁸ A July 2020 report by Polaris, a nonprofit organization knowledgeable about human trafficking, found that virtual currency was the second-most commonly accepted payment method on 40 platforms in the online commercial sex market—which has been used to facilitate sex trafficking.

My statement today discusses our prior work on (1) the extent to which the number of missing or murdered American Indian and Alaska Native women in the U.S. is known; and (2) what is known about the use of virtual currency for human and drug trafficking and the extent to which U.S. agencies collect data on these topics.

My statement is based on products we issued in October 2021 and December 2021, as well as selected updates to those reports that we conducted through January 2022.⁹ To perform our work for these reports, we reviewed available data and agency documentation, including agency policies and procedures. We also interviewed relevant officials and stakeholders.¹⁰ More detailed information on the scope and methodology of our prior work can be found in each of the issued reports cited throughout the statement.

We conducted the work on which this statement is based in accordance with generally accepted government auditing standards. Those standards

⁸Virtual currencies—digital representations of value, usually other than government-issued legal tender—are an emerging payment method. For the purposes of this hearing statement, we use the term “virtual currency” to include convertible virtual currencies, such as cryptocurrencies, and other industry labels such as digital assets and virtual assets. Drug trafficking generally refers to the illicit production, transportation, and distribution of controlled substances by an individual or drug trafficking organization in violation of U.S. criminal law.

⁹GAO, *Missing or Murdered Indigenous Women: New Efforts Are Underway but Opportunities Exist to Improve the Federal Response*, [GAO-22-104045](#) (Washington, D.C.: Oct 28, 2021), *Virtual Currencies: Additional Information Could Improve Federal Agency Efforts to Counter Human and Drug Trafficking* [GAO-22-105462](#) (Washington, D.C.: Dec. 8, 2021), and *Trafficking and Money Laundering: Strategies Used by Criminal Groups and Terrorists and Federal Efforts to Combat Them* [GAO-22-104807](#) (Washington, D.C.: Dec. 23, 2021). For these updates, we reviewed an executive order issued in November 2021, described later in this statement, and obtained information from DOJ on the status of their actions in response to our prior recommendations.

¹⁰Regarding missing and murdered AI/AN women, using agency data—which were determined to be reliable for location selection—and qualitative factors, we selected geographic locations to interview federal, state, local, and tribal officials; and nongovernmental victim service providers on the federal response to the crisis.

require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Number of Missing or Murdered AI/AN Women is Unknown

In October 2021, we reported that the total number of missing or murdered AI/AN women is unknown because federal databases do not contain comprehensive national data.¹¹ We identified four different databases that individually contain information on missing or murdered individuals, including AI/AN women.¹² However, due to differences in the characteristics of these databases, they cannot be combined together to estimate the total number of missing or murdered AI/AN women. Such differences include their intended purposes, specific contents, organization, and any applicable statutory restrictions. We also found other considerations that should be taken into account when using these data sources to try to estimate the total number of missing or murdered AI/AN women. For example, federal law requires federal, state, and local law enforcement agencies to report missing children under the age of 21, but missing adults—including missing AI/AN women who are 21 and older—are not subject to this mandatory reporting requirement.¹³ In addition, instances of missing AI/AN women may be underreported due to mistrust of law enforcement and other reasons, such as misclassifications of race or manner of death. In addition to federal databases, we reported that researchers, tribes, and states have conducted their own efforts to collect more comprehensive data on missing or murdered AI/AN women in selected regions, which also provide some information to understand the nature of cases in these regions.

¹¹[GAO-22-104045](#).

¹²According to DOJ officials, there is no single federal database that contains comprehensive national data on missing or murdered AI/AN women, or of other races.

¹³See 34 U.S.C. §§ 41307(a), 41308 for the mandatory reporting requirements applicable to missing children (under age 21).

Implementation of data-related requirements in two laws—Savanna’s Act¹⁴ and the Not Invisible Act¹⁵—enacted in October 2020, presents opportunities to increase and improve data on the number of missing or murdered Indians, including AI/AN women. For example, Savanna’s Act requires tribal consultations on how to improve tribal data relevance and access to databases. In addition, Savanna’s Act contains a provision to increase data on missing or murdered Indians reported in the Department of Justice’s (DOJ) annual Indian Country Investigations and Prosecutions report to Congress.¹⁶ Beginning in fiscal year 2022, Savanna’s Act requires the Attorney General to include known statistics on missing or murdered Indians throughout the U.S. available to DOJ—including information on age; gender; and tribal enrollment information or affiliation, if available—and the current number of open cases and total number of closed cases per state over a 10-year period.¹⁷ If the statistics in the annual report to Congress are not comprehensive, the Attorney General must explain why and make recommendations on how to improve the collection of data on missing or murdered Indians.¹⁸

In October 2021, we found that DOJ has taken some steps to analyze data in federal databases related to cases of missing or murdered AI/AN women, including publishing more detailed single-year statistics in 2020 on missing persons by race, gender, and age. However, data analysis efforts are in the early stages, and DOJ did not have a plan to continue these efforts past November 2021. As a result, we recommended that DOJ develop a plan for ongoing data analysis to identify relevant trends in cases of missing or murdered American Indian and Alaska Native

¹⁴Pub. L. No. 116-165, 134 Stat. 760 (2020). The law’s data-related requirements are codified at 25 U.S.C. §§ 5703-5705 and 34 U.S.C. § 20126(b).

¹⁵Pub. L. No. 116-166, 134 Stat. 766 (2020) The law’s data-related requirements appear in § 4, which calls for the establishment of a joint Department of Justice-Department of the Interior commission to develop recommendations to the Secretary of the Interior and the Attorney General on actions the federal government can take to help combat violent crime against Indians and within Indian lands, including recommendations for tracking and reporting data on instances of missing persons, murder, and human trafficking on Indian lands and of Indians. Pub. L. No. 116-166, § 4, 134 Stat. at 767-770.

¹⁶25 U.S.C. § 5705(a).

¹⁷25 U.S.C. § 5705(a)(1)-(2).

¹⁸25 U.S.C. § 5705(a)(4).

women. DOJ agreed with our recommendation.¹⁹ Developing such a plan could provide DOJ and other stakeholders with information to better understand the nature of the missing or murdered AI/AN crisis and identify emerging trends. We will continue to monitor actions DOJ takes to address our recommendation. Since our report, and consistent with our recommendation in November 2021, the President issued an executive order directing the Attorney General, in coordination with the Secretaries of the Interior and Health and Human Services, to develop a strategy for ongoing analysis of data collected on violent crime and missing persons involving Native Americans, including in urban Indian communities, to better understand the extent and causes of this crisis.²⁰

Extent of Virtual Currency Use in Human and Drug Trafficking

Data collected from selected federal agencies we reviewed provide some indication that the use of virtual currency in human and drug trafficking is increasing. However, a number of data capture shortfalls at these agencies and others may limit the completeness and accuracy of available data on the presence of virtual currency, human trafficking, and drug trafficking.

In December 2021, we found that virtual currency is increasingly used illicitly to facilitate human and drug trafficking, according to our review of agency documentation and data and interviews with officials.²¹ Financial institutions are required to file Suspicious Activity Reports with the Financial Crimes Enforcement Network (FinCEN) if they know, suspect, or have reason to suspect that a transaction may involve illicit activity.²² FinCEN is responsible for collecting, analyzing, and disseminating

¹⁹We made a total of four recommendations, including that DOJ and the Department of the Interior both develop plans to implement the requirements in Savanna's Act and the Not Invisible Act of 2019 that remain unfulfilled past their statutory deadlines. Both agencies concurred with our recommendations and we are monitoring planned actions to address them.

²⁰Executive Order 14053 § 4(c), 86 Fed. Reg. 64337, 64339 (Nov. 18, 2021).

²¹[GAO-22-105462](#). This is a public version of a sensitive report that we issued in September 2021. The December 2021 report omits sensitive information and data on selected federal agencies' activities to counter human and drug trafficking, associated use of virtual currency, and related challenges.

²²Under FinCEN regulation, banks and money service businesses are required to file this type of report when (1) a transaction involves or aggregates at least \$5,000 in funds or other assets for banks or at least \$2,000 in funds or other assets for money service businesses and (2) the institution knows, suspects, or has reason to suspect that the transaction is suspicious. See 31 C.F.R. §§ 1020.320 (Reports by Banks) 1022.320 (Reports by money service businesses).

financial intelligence information received from financial institutions—such as banks and virtual currency exchanges. Information collected by FinCEN indicates that the use of virtual currency in financial activity connected to human and drug trafficking is increasing. For example, in calendar years 2017 through 2020, the number of Suspicious Activity Reports financial institutions filed that referenced both virtual currency and human trafficking almost doubled, from 36 to 68.²³ The number of Suspicious Activity Reports filed with FinCEN that involve virtual currency and drug trafficking increased fivefold (from 252 to almost 1,432) from calendar year 2017 to 2020. While the filing of a Suspicious Activity Report is not a clear indication that a crime has occurred, it is an indicator of potentially illicit activity.

In addition, we found that law enforcement agencies, such as the Department of Homeland Security, DOJ, Internal Revenue Service (IRS), and the U.S. Postal Inspection Service, have also collected some data on the use of virtual currency in human or drug trafficking cases. For example, during the same 4-year period, IRS identified six investigations that involved virtual currency that were also associated with human trafficking—specifically sex trafficking. Similarly, U.S. Immigration and Customs Enforcement’s Homeland Security Investigations had one investigation that involved virtual currency and human trafficking. However, in a sensitive version of our report, we found that data from selected federal agencies on virtual currency use for human and drug trafficking may not be consistently captured.²⁴ Consequently, agencies may lack complete data when assessing or reporting on the illicit use of virtual currency in human and drug trafficking. In that report we made nine

²³Since 2018, FinCEN’s Suspicious Activity Report form has included a checkbox for filers to flag if the financial activity is associated with human trafficking. FinCEN’s summary data for calendar year 2017 were generated by querying narrative data, and summary data for calendar years 2018 through 2020 were produced by summing the number of Suspicious Activity Reports that selected the human trafficking check-box.

²⁴The sensitive version of our report, published in September 2021, described the extent to which each agency had methods and system controls in place for consistently collecting data on the presence of virtual currency, human trafficking, and drug trafficking and identified shortcomings related to the information agencies collect, along with causes of the shortcomings. Discussion of these methods, system controls, shortcomings, and related causes were omitted from the December 2021 public report and this statement because the information was deemed sensitive by DOJ.

recommendations to selected agencies to enhance their data collection practices.²⁵

Further, we found that selected federal agencies face challenges in countering the illicit use of virtual currency in human and drug trafficking. For example, FinCEN and the IRS oversee virtual currency entities. FinCEN imposes requirements for operators of virtual currency kiosks that are used to exchange virtual currencies for cash and are found in various locations such as convenience stores. While kiosk operators are required to register with FinCEN, they are not required to routinely report the specific locations of their kiosks. This limits federal agencies' ability to identify kiosks in areas that have been designated as high risk for financial crimes and could involve human and drug trafficking. Reviewing registration reporting requirements and taking appropriate action, as needed, to better identify individual kiosk locations by operator could help FinCEN and IRS identify high-risk kiosk operators to monitor for compliance, while also improving information law enforcement has available to identify potentially illicit transactions. Therefore, we recommended that FinCEN and IRS review virtual currency kiosk registration requirements. FinCEN and IRS concurred with our two recommendation but did not provide us with information about any actions they have taken in response.

To address counter-trafficking challenges, federal agencies use interagency task forces and other mechanisms to share information on and coordinate their efforts to identify and combat trafficking activities. In December 2021, we found that federal agencies have a number of initiatives to make information from financial institutions more available or

²⁵In the sensitive version of our report, published in September 2021, we made nine recommendations that to the extent practicable, FinCEN, U.S. Immigration and Customs Enforcement-Homeland Security Investigations, U.S. Secret Service, the Drug Enforcement Administration, the Federal Bureau of Investigation, DOJ's Criminal Division, DOJ's Justice Management Division, IRS Criminal Investigation, and the U.S. Postal Inspection Service, identify and employ improved methods to consistently capture data on the use of virtual currency in human and drug trafficking. All but one agency, the Department of Homeland Security's Immigration and Customs Enforcement-Homeland Security Investigations, concurred with the recommendation. Our sensitive report described the extent to which each agency had methods and system controls in place for consistently collecting data on the presence of virtual currency, human trafficking, and drug trafficking and identified shortcomings related to the information agencies collect, along with causes of the shortcomings. Discussion of these methods, system controls, shortcomings, and related causes have been omitted from this statement because the information was deemed sensitive by DOJ.

more useful for trafficking-related investigations, and to enhance agencies' ability to analyze such information.²⁶ We also found that there are initiatives that seek to enhance federal agencies' analysis of data from financial institutions and other sources to identify trafficking-related activities, patterns, and networks. For example, FinCEN has sought to improve the quality of the Suspicious Activity Report data it receives from financial institutions by issuing advisories and other guidance developed in collaboration with law enforcement agencies. FinCEN's October 2020 Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity, for example, specifically seeks to collect additional information on potential instances of human trafficking.²⁷ The advisory provides examples of criminal approaches—referred to as typologies—that human traffickers and facilitators have used to launder money. It also provides red flag indicators and case studies of human trafficking. Specifically, this advisory described the use of front companies that appear legitimate (e.g., massage businesses, restaurants) and visa fraud and wage retention as ways to launder money in support of human trafficking. The advisories are intended to help institutions better understand what transactions or customer activities to report to support law enforcement investigations. Consequently, they help better inform data collection efforts in support of identifying and prosecuting human-traffickers.

Thank you, Chairwoman Johnson, Ranking Member Lucas, and Members of the Committee. This concludes my prepared statement. I would be happy to respond to any questions you may have at this time.

GAO Contacts and Staff Acknowledgments

If you or your staff members have any questions about this testimony, please contact me at (202) 512-8777 or goodwing@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Key contributors to this statement include Joseph P. Cruz, Assistant Director; Andrew Curry, Analyst-in-Charge; Verginie Tarpinian, and Lauren Ostrander. Key contributors to the previous work discussed in this statement are listed in each of the cited reports.

²⁶GAO, *Trafficking and Money Laundering: Strategies Used by Criminal Groups and Terrorists and Federal Efforts to Combat Them* [GAO-22-104807](#) (Washington, D.C.: Dec. 23, 2021).

²⁷See, FinCEN *Supplemental Advisory on Identifying and Reporting Human Trafficking and Related Activity*, FIN-2020-A008 (Oct. 15, 2020).

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